

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,	:	
	:	
v.	:	Case No. 1:17-CR-00009 (TSE)
	:	
ALEXANDER K. TVERDOKHLEBOV,	:	
	:	
Defendant.	:	

**SUPPLEMENT TO POSITION OF THE DEFENDANT**  
**WITH RESPECT TO SENTENCING FACTORS**

COMES NOW the defendant, ALEXANDER K. TVERDOKHLEBOV,  
(hereinafter, Mr. Tverdokhlebov), by and through counsel, and files this, his supplement  
to his position with respect to the sentencing factors to be used in this matter  
(hereinafter, the Defendant's Supplemental Position), and for it he states:

- 1, As noted in the presentence investigation report (hereinafter, the report),  
Mr. Tverdokhlebov used marijuana on an almost daily basis until January  
2017, he used cocaine three to four times per week and he used alcohol  
three to four times per week. He has never had treatment for his drug and  
alcohol abuse but believes he could benefit from substance abuse  
treatment. Report, p. 16, ¶ 66.
2. Mr. Tverdokhlebov requests that at sentencing in this matter the Court  
recommend to the Bureau of Prisons that he be admitted to the RDAP  
intensive substance abuse program during his incarceration.

Respectfully submitted,

ALEXANDER K. TVERDOKHLEBOV

By: \_\_\_\_\_/s/  
WILLIAM B. CUMMINGS, ESQUIRE  
VA Bar No. 6469  
Counsel for ALEXANDER K. TVERDOKHLEBOV  
WILLIAM B. CUMMINGS, P.C.  
Post Office Box 1177  
Alexandria, Virginia 22313  
(703) 836-7997  
Fax (703) 836-0238  
[wbcplaw@aol.com](mailto:wbcplaw@aol.com)

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT on the 3<sup>rd</sup> day of July, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to at least the following registered ECF users:

Kellen Dwyer, Esquire  
[Kellen.dwyer@usdoj.gov](mailto:Kellen.dwyer@usdoj.gov)  
Laura Fong, Esquire  
[Laura.fong@usdoj.gov](mailto:Laura.fong@usdoj.gov)  
United States Attorney's Office for  
the Eastern District of Virginia  
2100 Jamieson Avenue  
Alexandria, Virginia 22314

AND I HEREBY CERTIFY THAT on July 3, 2017, I am mailing the foregoing document, and the NEF, by U.S. mail to the following non-filing user:

Quentin T. Lowe – U.S. Probation Officer  
401 Courthouse Square  
Alexandria, VA 22314

\_\_\_\_\_/s/  
WILLIAM B. CUMMINGS, ESQUIRE  
VA Bar No. 6469  
Counsel for ALEXANDER K. TVERDOKHLEBOV  
WILLIAM B. CUMMINGS, P.C.  
Post Office Box 1177  
Alexandria, Virginia 22313  
(703) 836-7997  
Fax (703) 836-0238  
[wbcplaw@aol.com](mailto:wbcplaw@aol.com)